

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 3:16-CV-489-CWR-RHWR**

**HINDS COUNTY, ET AL.**

**DEFENDANTS**

**DEFENDANTS' RESPONSE TO INTERESTED PARTIES' MOTION  
FOR ACCESS TO EXHIBITS, TRANSCRIPTS, AND VIRTUAL PARTICIPATION**

Defendants, Hinds County, Hinds County Board of Supervisors, and Tyree Jones, in his official capacity as Sheriff, respectfully submit this response in opposition to the motion for access to exhibits, transcripts, and secure virtual accommodation for consolidated evidentiary hearing [147] filed by J.H. and Disability Rights Mississippi ("Henley-Young Plaintiffs").

Defendants do not oppose the Henley-Young Plaintiffs' motion to the extent it seeks access to exhibits and transcripts admitted in the public record. Nor do Defendants oppose the Henley-Young Plaintiffs' "remote access" to the ongoing evidentiary hearing, starting February 21, 2022, although it appears one of their attorneys already is and has been present, in-person throughout proceedings related to the ongoing consolidated hearing. Defendants agree with the United States that the Henley-Young Plaintiffs should not have access to sealed records relating to detainees housed outside the Henley-Young facility, especially those records containing sensitive medical and other identifying information. Those records exceed the Henley-Young Plaintiffs' class representation.

This, the 18th day of February, 2022.

Respectfully submitted,

**PHELPS DUNBAR, LLP**

BY: /s/ Nicholas F. Morisani

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I, Nicholas F. Morisani, certify, that, on February 18, 2022, I had this RESPONSE electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record in this matter.

/s/ Nicholas F. Morisani

Nicholas F. Morisani